

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

WATCH TOWER BIBLE AND TRACT SOCIETY OF
PENNSYLVANIA,

Plaintiff,

-against-

THE TRUTH AND TRANSPARENCY FOUNDATION,
RYAN C. McKNIGHT, and ETHAN G. DODGE,

Defendants.

No. 1:20-cv-03366

[PROPOSED] FINAL ORDER AND JUDGMENT ON CONSENT

WHEREAS Plaintiff filed a Complaint herein on April 30, 2020 alleging infringement of 74 copyrighted works (the “Works”) under the Copyright Act, 17 U.S.C. §§ 101 *et seq.*;

WHEREAS Plaintiff warrants and represents that it is the owner of valid copyrights in the Works;

WHEREAS Plaintiff has agreed to withdraw this action with prejudice except as necessary for the court to retain jurisdiction to enforce the terms of this Final Order and Judgment on Consent, including the injunction set forth below; and

WHEREAS Defendants have agreed to settle this dispute on the terms set forth below, and have consented to the entry of this Final Order and Judgment on Consent;

NOW, THEREFORE, Plaintiff and Defendants request entry of this Final Order and Judgment on Consent.

IT IS ORDERED, ADJUDGED AND DECREED that:

(a) This Court has jurisdiction of the subject matter herein and of the parties who have consented to entry of this Final Order and Judgment on Consent, and shall retain

jurisdiction to enforce the terms of this Final Order and Judgment on Consent, including the injunction set forth below.

(b) The Court shall enjoin and hereby does permanently enjoin, prevent and restrain Defendants, their agents, representatives, employees and those acting in concert with them, from

(1) using or causing to be used, or authorizing or facilitating any third party to use, any of the Works in any medium including but not limited to the *faithleaks.org* website, and any other website operated or controlled, in whole or in part, by Defendants or any of them; and

(2) using or causing to be used, or authorizing or facilitating any third party to use, any copyrighted works other than the Works, now in existence or to be created in the future, that are owned by Plaintiff or by entities that cooperate with Plaintiff.

(c) Defendants shall pay to Plaintiff the amount of \$15,000 in settlement of any and all claims for damages or other monetary relief in this action.

(d) Other than as set forth above, Plaintiff waives any right to damages, an accounting for profits, attorneys' fees or any other monetary relief asserted in this action, but shall have the right to reinstate said claims if Defendants fail to comply with the terms of this Final Order and Judgment on Consent.

(e) Any breach by Defendants of the terms of this Final Order and Judgment on Consent shall be deemed to constitute immediate and irreparable injury to Plaintiff.

(f) Each party shall bear its own costs and expenses incurred in this action.

(g) This Court shall retain continuing jurisdiction over the parties and over the subject matter of this action for the purposes of interpreting and enforcing the terms of this Final Order and Judgment on Consent.

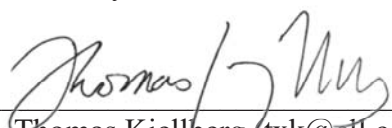
(h) This Final Order and Judgment on Consent shall be binding on the parties and their heirs, successors and assigns.

(i) All of the parties hereto consent to the issuance and entry of this Final Order and Judgment on Consent and waive the right to appeal from or otherwise contest this Final Order and Judgment on Consent, which may be entered in the form and content set forth above without further notice to any party.

AGREED AS TO FORM AND SUBSTANCE:

Dated: New York, New York
July 14, 2020

COWAN, LIEBOWITZ & LATMAN, P.C.
Attorneys for Plaintiff

By: 
Thomas Kjellberg (txk@cll.com)

114 West 47th Street
New York, New York 10036-1525

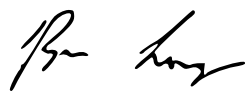
Dated: Patterson, New York

WATCH TOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA

By: _____
Philip Brumley
General Counsel

Dated: New York, New York
7/15/20

LONG ASSOCIATES PLLC
Attorneys for Defendants

By: 
Ryan E. Long (rlong@landapllc.com)

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18 West 18th St. – 10th Floor
New York, New York 10011

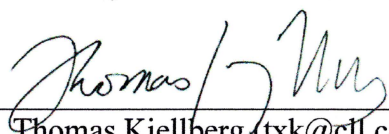
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July 14, 2020

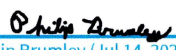
COWAN, LIEBOWITZ & LATMAN, P.C.
Attorneys for Plaintiff

By: 
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114 West 47th Street
New York, New York 10036-1525

Dated: Patterson, New York
Jul 14, 2020

WATCH TOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA

By: 
Philip Brumley (Jul 14, 2020 16:39 EDT)
Philip Brumley
General Counsel

Dated: New York, New York

LONG ASSOCIATES PLLC
Attorneys for Defendants

By: _____
Ryan E. Long (rlong@landapllc.com)

Long & Associates PLLC
18 West 18th St. – 10th Floor
New York, New York 10011

Dated: Henderson, Nevada
07/14/2020


THE TRUTH AND TRANSPARENCY
FOUNDATION

By: 

Ryan C. McKnight

Dated: Henderson, Nevada
07/14/2020

RYAN C. McKNIGHT



Ryan C. McKnight

Dated: Sunnyvale, California
07/14/2020

ETHAN G. DODGE



Ethan G. Dodge

APPROVED AND SO ORDERED this ____ day of _____, 2020.

Mary Kay Vyskocil
United States District Judge